(3/22/2010) Maria NEYRA - Proposed protective order on consent

Page 1

From:

"Gujarati, Diane (USANYS)" < Diane.Gujarati@usdoj.gov>

To:

"Roy BLACK" <RBLACK@royblack.com>

CC:

"Howard SREBNICK" <HSREBNICK@royblack.com>, "Maria NEYRA"

<MNEYRA@roybla...

Date:

5/15/2008 12:17 PM

Subject:

Proposed protective order on consent

Attachments: ProtectiveOrderFed.pdf

Roy: Attached is a proposed protective order on consent relating to materials obtained from the Board of Governors of the Federal Reserve System along the lines we discussed. Please let us know your thoughts at your convenience. Thanks.

<< ProtectiveOrderFed.pdf>>



UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

PROTECTIVE ORDER

ON CONSENT

MARIO S. LEVIS,

a/k/a "Sammy Levis,"

08 Cr. 181 (TPG)

Defendant. :

Upon the application of the United States of America, Lev L. Dassin, Acting United States Attorney, by Diane Gujarati and Christopher L. Garcia, Assistant United States Attorneys, and Jason M. Anthony, Special Assistant United States Attorney, and with the consent of the defendant, MARIO S. LEVIS, a/k/a "Sammy Levis," by and with the consent of his attorneys, Roy Black, Esq., Howard Srebnick, Esq., and Maria Neyra, Esq.,

IT IS HEREBY ORDERED:

- 1. Documents provided to the United States Attorney's Office for the Southern District of New York by the Board of Governors of the Federal Reserve System may be disclosed to the defendant by the Government pursuant to Fed. R. Crim. P. 16 and are deemed "confidential information."
- 2. Confidential information disclosed to the defendant or his counsel during the course of proceedings in this action:
- a. Shall be used by the defendant and his attorneys only for purposes of this criminal action;
- b. Shall not be disclosed in any form by the defendant or his attorneys except as set forth in paragraph 2(c) below;

- c. May be disclosed by the defendant or his attorneys only to the following persons (hereinafter "designated persons"): (i) all personnel employed full-time or part-time by the defendant's attorneys and their law firm; (ii) independent expert witnesses or advisors retained by the defendant or his attorneys in connection with this criminal action; (iii) transactional witnesses or their counsel, to the extent deemed necessary by defense counsel for trial preparation; and (iv) such other persons as hereafter may be authorized by the Court upon such motion by the defendant or his attorneys. Copies of documents containing confidential information may not be given to or remain in the custody of transactional witnesses.
- 3. The defendant and his attorneys shall provide a copy of this Order to the designated persons to whom they disclose confidential information pursuant to paragraph 2(c). Designated persons shall be subject to the terms of this Order.
- 4. All documents subject to this Protective Order must be returned to the United States Attorney's Office at such time as they are not needed in this action, at the end of the criminal proceedings, or upon Order of the Court, whichever occurs first.
- 5. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in this action or to any Judge or Magistrate Judge of this Court for purposes of this

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action.

Dated:

New York, New York May , 2008

SO ORDERED:

HONORABLE THOMAS P. GRIESA UNITED STATES DISTRICT JUDGE From:

"Gujarati, Diane (USANYS)" < Diane.Gujarati@usdoj.gov>

To:

"Maria NEYRA" < MNEYRA@royblack.com>

CC:

"Garcia, Christopher (USANYS)" < Christopher. Garcia@usdoj.gov>

Date:

5/29/2008 11:19 AM

Subject:

RE: US v. Levis - re: Protective Order

Thanks, Maria. Please let us know what individual/entity each represents so we can include that information. Also for "Frankie Rebollo," is that his full name? (Not sure whether Frankie is his full first name or a shortened version -- I'd like to use whatever his proper name is). Thanks.

----Original Message----

From: Maria NEYRA [mailto:MNEYRA@royblack.com]

Sent: Tuesday, May 27, 2008 3:06 PM

To: Gujarati, Diane (USANYS)

Subject: US v. Levis - re: Protective Order

Hi Diane: Roy asked me to forward the names of joint defense counsel. They are as follows:

Scott Srebnick Greenberg Traurig, P.A. and Frankie Rebollo.

Let me know if you need any further information/details.

Kind regards.

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Page 1

From:

Maria NEYRA

To:

diane.gujarati@usdoj.gov

Date:

6/4/2008 10:27 AM

Subject:

U.S. v. Levis

Hi Diane: I hope your doing well. I've confirmed the below re: the protective order proposed.

Scott Srebnick represents Mario S. Levis Greenberg Traurig, P.A. represents David Levis

I've been advised, however, that "Francisco Rebollo" is no longer serving as counsel.

Have a great day!